

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ÁNGEL RIVERA – RUIZ

Plaintiff

v.

VANGUARD EMERGENCY
MANAGEMENT A/K/A VANGUARD
INSPECTION SERVICES; ET. AL.

Defendants

Civil No. 3: 20-CV-01316-JAG

NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

TO THE HONORABLE COURT:

NOW COMES Plaintiff, ANGEL RIVERA-RUIZ, through the undersigned *Pro Bono* attorney and very respectfully STATES, ALLEGES AND REQUESTS:

1. On July 7, 2020, Plaintiff filed the above captioned case, pro se, and requested the Court authorize him to proceed *in forma pauperis*.
2. Plaintiff, also, request appointment of counsel *Pro Bono*.
3. The undersigned attorney was named as Plaintiff's *Pro Bono* counsel by the Court.
4. After reviewing the Complaint -in which Plaintiff joined causes of action under ADEA,¹ the Civil Rights Act of 1964,² and the False Claims Act³ against various corporate defendants- the undersigned attorney met with Plaintiff to discuss the matter.

¹ 29 U.S.C.A. §§ 621 – 634.

² 42 U.S.C.A. §§ 2000e-2 and 20000e-3

³ 31 U.S.C.A. §§ 3729 – 3733.

5. As a result of said meetings and discussions, Plaintiff authorized the undersigned counsel to notify his voluntary dismissal of the Complaint, *without prejudice*, pursuant to Rule 41(a)(1)(A) of the Fed Rules of Civil Procedure.

6. None of the named Defendants have answered the Complaint or filed a motion for summary judgment.

7. None of the above captioned causes of action involve a certified class or a class proposed to be certified; a derivative action or an action in which a receiver has been appointed.

8. Therefore, pursuant to Rule 41(a)(1) of the Fed Rules of Civil Procedure, the present notice of dismissal does not require a Court order and will operate as a dismissal without prejudice.

WHEREFORE Plaintiff, ANGEL RIVERA-RUIZ, respectfully requests this Honorable Court dismiss the above captioned case WITHOUT PREJUDICE.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, on August 10, 2020.

I HEREBY CERTIFY: that on this date I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the case of caption.

/S/ David K. Rodríguez Encarnacion
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